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May 13, 1999

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, rm. 1061
Rockville, MD 20852.

Dear Sir or Ms:

I am writing to express my opinion that the wording of the current radiation disclosure statement should **not** be revised, and that such labeling requirements should **not** expire at a specified date in the future. I would also like to respond to some of the questions posed by the FDA in the Call for Public Comments in the Federal Register: February 17, 1999 (Volume 64, Number 31):

(1) Does the current radiation disclosure statement convey meaningful information to consumers in a truthful and nonmisleading manner?

Answer: Yes, it is meaningful to know that food has been treated with irradiation since the effects are still not completely known, and this information is truthful and not misleading.

(2) How do consumers perceive the current radiation disclosure statement--as informational, as a warning, or as something else?

Answer: As a consumer, I perceive it as informational and something that I can use for my own personal research and to make an informed decision.

(3) Does the wording of the current radiation disclosure statement cause "inappropriate anxiety" among consumers? What are examples of "inappropriate anxiety"?

Answer: No, and I don't know.

(4) What specific alternate wording for a radiation disclosure statement would convey meaningful information to consumers, in a truthful and nonmisleading manner, and in a more accurate or less threatening way than the current wording?

Answer: None – it is completely accurate.

(5) Would consumers be misled by the absence of a radiation disclosure statement in the labeling of irradiated foods? Are consumers misled by the presence of such a statement?

Answer: Absolutely, since we have a right to know this, and the health effects are not completely known. And, no, its presence is not misleading.

(6) With respect to foods containing irradiated ingredients, are consumers misled by the absence of a radiation disclosure statement? Would consumers be misled by the presence of such a statement?

Answer: Yes, and not if it said, "some ingredients have been treated by irradiation".

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(7) What is the level of direct consumer experience with irradiated foods that are labeled as such?

Answer: I have never noticed food labeled as such.

(8) What is the effect of the current required labeling on the use of irradiation? Does the current required labeling discourage the use of irradiation?

Answer: I don't know.

(9) What do consumers understand to be the effect of irradiation on food? For example, what do consumers understand about the effect of irradiation on the numbers of harmful microorganisms in or on food?

Answer: I understand it to mean that irradiation destroys potentially harmful bacteria.

(10) Do consumers readily recognize the radura logo?

Answer: Not yet, but no logos are immediately recognizable, but must be learned over time.

(11) Do consumers understand the logo to mean that a food has been irradiated?

Answer: Not yet, but no logos are immediately recognizable, but must be learned over time.

(12) Do consumers perceive the radura logo as informational, as a warning, or as something else?

Answer: Not yet, but people will learn to perceive them as informational.

(13) Should any requirement for a radiation disclosure statement expire at a specified date in the future?

Answer: No, we must first learn more about the health effects through long-term studies, then decide whether it should be removed.

14) If so, on what criteria should the expiration be based?

(15) If the expiration of labeling requirements for irradiated foods is to be based on consumer familiarity with the radura logo and understanding of its meaning, what evidence of familiarity and understanding would be sufficient to allow these requirements to expire?

Answer: The majority of the general public recognizes the logo, and understands that it means that food has been treated with radiation.

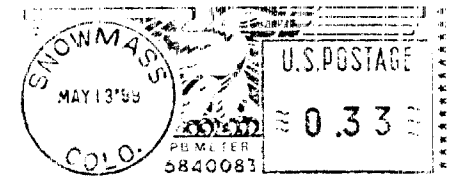
Sincerely,

A handwritten signature in black ink, appearing to read "David Beal". The signature is fluid and cursive, with the first name "David" and last name "Beal" clearly distinguishable.



Dan Bakal / 200

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